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IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF **PENNSYLVANIA** 

In re:

PIERRETTE V. PEARSON, : CHAPTER 13

**Debtor** 

**: BANKRUPTCY NO. 22-10803** 

**DEBTOR'S ANSWER TO TRUSTEE'S MOTION TO DISMISS** 

The Debtor has not delayed in prosecuting this case. The mortgagee of the Debtor's property at 5042 Gainor Rd., Philadelphia, PA. 19131, has proposed that the Debtor apply for a modification of that mortgage bnd that the morgagee will offer a loan modification to the Debtor as a means of resolving the primary disputes in this case. The Debtor

is awaiting a specific loan modification offer in order to determine whether such a resolution is

acceptable to her.

WHEREFORE, the Debtor requests that the Trustee's Motion to Dismiss this

bankruptcy case.be denied; or, in the alternative, that the next scheduled hearing of December

15, 2022, be continued.

Date: November 21, 2022 Attorney for Debtor

> /s/DAVID A. SCHOLL 512 Hoffman Street Philadelphia, PA. 19148

610-550-1765